

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JAMES CONTANT, MARTIN-HAN TRAN,
CARLOS GONZALEZ, UGNIUS MATKUS,
JERRY JACOBSON, and PAUL VERMILLION,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

BANK OF AMERICA CORPORATION, *et al.*,

Case No. 1:17-cv-03139-LGS

ECF CASE

**DEFENDANT RBC CAPITAL MARKETS LLC'S
RULE 7.1 CORPORATE DISCLOSURE STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel states that Defendant RBC Capital Markets, LLC is an indirect, wholly-owned subsidiary of Royal Bank of Canada. Royal Bank of Canada is a publicly traded corporation listed on the New York Stock Exchange (NYSE) and Toronto Stock Exchange (TSX). There are no publicly held corporations that own 10% or more of Royal Bank of Canada's common stock. There are no other corporations, unincorporated associations, partnerships or other business entities that are not parties that may have a financial interest in the outcome of this litigation.

Date: May 10, 2017

By: /s/ James P. McLoughlin, Jr.

James P. McLoughlin, Jr.

MOORE & VAN ALLEN PLLC

100 North Tryon Street, Suite 4700

Charlotte, NC 28202-4003

Telephone: (704) 331-1000

Facsimile: (704) 331-1159

jimmcloughlin@mvalaw.com

Attorney for Defendant

RBC Capital Markets, LLC